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**HECA RESPONSE  
TO THE  
QQI GREEN PAPER  
ON THE  
ASSESSMENT OF LEARNERS AND  
LEARNING**

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# HECA Response to the QQI Green Paper on the Assessment of Learners and Learning

## Introduction

As the representative association for the providers of private and independent higher education in Ireland, HECA welcomes the opportunity to respond to the QQI Green Paper on the Assessment of Learners and Learning. The genuine candidness and breath of the questions is a beneficial direction for future discussions on assessments in the higher education sector.

In particular, HECA supports QQI's commitment to driving excellence in assessment of learners and learning in the sector and embraces the transparent way in which QQI is approaching assessment reform.

## Summary Overview

We welcome this opportunity to respond to the QQI Green Paper published in March 2018. This submission follows the same general thematic headings as the Green Paper, with sections covered that are of interest to HECA. Comments relating to particular questions in the Green Paper are flagged, for ease of reference.

HECA do not intend to engage in a detailed critique of the Green Paper. Rather we intend to succinctly outline the key assessment issues, implications and potentials for assessment reform. Moreover, due to the comprehensive breath of assessment's issues in the Green Paper, HECA is determined to focus on the key assessment issues that affect HECA providers.

HECA is committed to working with QQI to achieve a system that makes a valuable contribution to the sector on higher education assessment reform. Putting assessment at the core of the higher education is an important focus for the Green Paper and this fits with HECA's commitment. Excellent teaching characteristically builds on and is intimately linked with excellent assessment strategy and practices. This is central to the outstanding learner's experience HECA providers deliver. Furthermore, we believe that the objectives of any assessment reform should:

- promote continuing institutional improvement of assessment strategy
- give learners valuable information about assessments to inform choices
- encourage diversity and innovation in the higher education sector
- promote pedagogy driven quality digital assessment
- minimise administrative processes, duplications and outlays
- evade unfair market misrepresentations
- conserve and support the reputation of the Irish higher education sector

HECA's response has been informed and developed through extensive consultation across the HECA sector including a HECA Colloquium based on the Green Paper and assessment reform, as well as dedicated consultations with HAQEF (HECA Academic Quality Enhancement Forum) on this issue. Our response aims to echo the views of the diverse and innovative HECA sector. This response also builds upon QQI's 2013 *Quality Assuring Assessment* report as well as the National Forum for the Enhancement of Teaching and Learning publication on *Assessment OF/FOR/AS Learning* over 2017-18.

We acknowledge that there are already many mechanisms in place to ensure assessments of quality, equality, and improved learners' outcomes are enforced across the HECA sector. HECA are constantly seeking ways to innovate and improve assessments for learners and learning and we have invested heavily in time, effort and resources to ensure that we provide a broad depth and range of assessments to support our learner's varied needs and abilities. We welcome ideas in how to further improve assessments for our learners and learning and therefore, welcome, the open, transparent and consultative nature of the Green Paper.

## General Assessment Issues

### ADAPTABILITY

We believe that adaptability is important in the practical scholarship of assessment especially in relation to the uptake of new technologies and the evolution of digital assessments. New technologies are rapidly changing higher education and the workforce; therefore, the assessment of learners and learning needs to facilitate the forward-thinking graduate and support the learner's ability to respond to the changing themes of the modern world. Digital assessments and processes need to achieve the same level of rigour as written exams and construct new responses to the current emphasis on high-stakes summative assessment.

The whole higher education sector needs to look at how they will assess their learners and learning and develop increasingly sophisticated understandings and skills for designing and producing fit-for-purpose, quality, digital assessments in higher education. Assessment practices need to adopt technology in innovative ways to improve efficiency and support learners establish a sustainable career if they are "*to remain matched to current needs and realities*". We believe that focused work in digital assessment necessitates collaborative working across the higher education sector to create a community of shared learning that cultivates the rapid changes in technology with vision, experience, leadership and a genuine understanding of the challenges faced.

## WORKING WITH INTENDED LEARNING OUTCOMES AND HOLISTIC ASSESSMENT

*What can be done, and by whom, to help build expertise in expressing learning outcomes and suitably aligning assessment with them at module level and especially at programme level? (section 7.2)*

We recommend further emphasis on the core underpinning principles of assessment to develop expertise and competencies in clear and rationale mapping of assessments from module learning outcomes to programme learning outcomes. We acknowledge that there may be different approaches and competencies in expressing learning outcomes and aligning learning outcomes to assessments. Therefore, to enable expertise on this subject, we need to look at how we can provide a common vocabulary and understanding of assessment development for modular and programme teams, validation panels and regulatory bodies to operate within.

A critical step would be instigating an expansion of the concise principles referred to in QQI's Quality Assuring Assessment Guidelines for Providers (2013) and building on this to establish an agreed framework across the higher education sector on assessment principles. It is recommended that rather than having a set rule of defining methods or rules and regulations, QQI determine a set of principles with some flexibility at grass-root level. Learning outcomes can be grounded in these and though the principles should be immutable, interpretation should allow for some innovation in context to certain disciplines. Conversely, core assessment principles would be aligned to core learning outcome statements and that should be universal and apply in all contexts. If there were absolute principles, that cannot be breach, then we can develop quite good dialogue and expertise locally and we can develop appropriate interpretation.

Another point is that academics at modular level can be very well intentioned in their chosen method of assessment but may require support at developing competencies to directly address what constitute a valid intended learning outcome (ILO) statement and ways in which we can adequately assess it. Training in aligning modular assessments to programme level, as well as developing a clearer understanding of the validation processes are essential in building expertise.

### CONSISTENT INTERPRETATION OF STATEMENTS OF LOS

*Do you agree that disciplinary communities have an important role in supporting the consistent interpretation of learning outcomes? How do such communities exert influence on educational and training programmes? Are there opportunities for improvement? (Section 7.3)*

We agree with this question, and in keeping with the inclusive spirit of the Green Paper, we suggest that disciplinary communities should include as many different stakeholders as possible. Providers, practitioners, student representatives and learning communities themselves are all part of the communities of practice that are central to the interpretation and development of intended learning outcomes.

Fundamentally, disciplinary communities i.e. professional bodies are interested in the end-product of what the learning outcomes achieves; the graduates as professionals. There is also the potential to involve other bodies or groups (internal or external to the relevant discipline) which can add a further perspective in the transformational processes that happen within the programme itself. On the other hand, employers, for example, don't have expertise on assessment strategy but they do have expertise on the role of the disciplinary communities in supporting the programme. These professionals can all exert influence on educational programmes but from a different perspective of standards to academics.

A significant opportunity for holistic enhancement would be establishing a forum of the collective voices at the beginning of a programme development or programme review. This is key to giving an equality of expression across the spectrum of relevant disciplinary communities, from learners to statutory bodies. By uniting the communities of practice with one voice, it may also remove the need for providers to move between statutory bodies and awarding bodies and efficiently establish a clear interpretation of learning outcomes.

### **PROGRAMME ASSESSMENT STRATEGY AND INTEGRATED ASSESSMENT**

*Do you agree that all programmes should include a programme-specific assessment strategy as indicated in this Green Paper? What are the obstacles to implementing programme assessment strategies as envisaged here? What else, beyond what we have indicated, should be addressed by a programme assessment strategy? (section 7.5)*

Yes. The problem is the academic culture has leaned towards individuals acting alone, rather than seeing themselves as part of a team capable of taking a programme view. This academic individualist culture barrier is being overcome but ensuring that there is a programme-specific assessment strategy will help.

If the programme-specific assessment strategy is too detailed and specific it may have unintended consequences that may impede the learning that the programme is trying to achieve. A set of assessment principles embedded within each programme to address what you want learners to achieve but with flexibility at a modular level is recommended.

#### *Other Points to be addressed by a Programme Assessment Strategy*

- A more flexible approach to programme assessment strategies would be advantageous and reduce the risk of duplication. For example; assessments in modules can be quite rigid and require a considerable length of time to change, especially examinations. Also, when submitting the programme schedule, further changes can be made to continuous assessment but not exams.
- The language used for programme-specific assessment strategy is varied and is open to different interpretations.
- Innovative ways, as well as lessening potential duplication, could be achieved through more nuance interpretation rather than rigid interpretation.

Additionally, we need to build capacity within the sector for good MIPLO and MIMLO framing. The more opportunities we have to share practice, the better. This is really an issue



of building a community of practice and programme design expertise which QQI could facilitate.

It's generally accepted in the higher education sector that it is best practice to incorporate the learner in the programme-specific assessment strategies and process. Moreover, it is a part of the QQI guidelines. In the same way, educational providers greatly appreciate QQI's recent inclusion in giving providers a voice in reviewing and reforming assessments policies, strategies and practices.

## **DIVERSITY AND ASSESSMENT**

*Please comment on the accommodation of diversity. (section 7.6)*

Learner diversity has many dimensions, including considerable individual and group differences in ethnicity, gender, culture, previous educational experiences, optimal modes of learning, and groups of learners with unique kinds of challenges, including the learners with disabilities, socio-economically disadvantaged and English language learners. All learners must be taught, assessed and reach a proficient standard in the learning outcomes of the programme. Still, the reality of learner diversity challenges higher education providers to deliver demanding programmes that meet learners where they are academically, maximise their growth as learners, and accelerate their learning to achievement the relevant standard and programme award.

It is not surprising that diverse students have differentiated needs and it is a significant quest to understand how do we maintain a learner-centred approach, and not provide tailored assessments given the diversity of the learners? Can you authentically have one without the other? The recommendation to QQI would be to start work, and this is no easy or quick task, on how this circle can be squared.

One potential method of supporting the development of the diverse learner i.e. international or mature learner is through learner training. An international learner may receive training in the Irish educational system and specific assessment practices that the international learner may not be familiar with. Another method could be to have effective interventions to match and support the diverse learners needs while maintaining the same assessment strategy and practice for all learners. The use of formative assessments that create personal and educational development may also be beneficial. In relation to the mature learner, building on their experiential learning, utilising more coursework than exams may provide beneficial.

Effective learner-centred feedback cannot be understated and its essential that diversity and feedback is brought in at all levels in combination with a balanced workload. It may be that the educator requires further support or CPD to set up a reliable, robust and secure infrastructure to accommodate the diverse learner.

In relation to mature and international learners, HECA would encourage the provision of additional support for the diverse learner whilst still enforcing the same assessment and

learning outcome standards. It may also be beneficial to explore diversifying the curriculum/assessment, e.g. allowing learners to utilise blockchain portfolios where the learner's knowledge and skills gained and applied over the programme are traceable in a portfolio of their learning. In turn, this could be significantly more beneficial to future employers as a gage of competencies, skills and knowledge than a heavily weighted summative or final exam.

## **ASSESSMENT IN THE QUALIFICATIONS AND QUALITY ASSURANCE (EDUCATION AND TRAINING) ACT 2012**

*Do you agree that the burden of summative assessment for certification might be unsustainable by some organisations that might be otherwise capable of providing programmes of education and training? What are the implications? (section 7.7)*

Yes. There is a risk of over assessment and unnecessary duplication of work with a strict compliance to summative assessments. This can dampen motivation for learning and learners. Formative assessments could be use at an agreed proportional level to lessen the burden of summative assessments. Formative assessments could be aligned to learners evaluating their own and peer learning as well as supporting learners grasp of specific topics or practices. This could be used to enhance the learning process without it contributing to the grade, module or programme. Modular learning outcomes that feed into the same programme learning outcomes could also be assessed summatively once in the programme (instead of in every module) to avoid unnecessary duplication of assessments and to avoid over assessment.

## **ASSESSMENT OF PRIOR LEARNING**

*Do you agree that RPL assessment should be reserved to those who can specialise in this kind of assessment? What are the implications? (section 7.8)*

No, the onus should be all providers; in principle, to be able to facilitate RPL. Otherwise, it may be unfair on the learner, for example, due to geographical constraints. It is, however, acknowledged that some types of programmes can facilitate RPL more readily, i.e. it is more problematic and difficult if not modularised.

For learners who have received their qualification in another jurisdiction, they may be required by professional bodies to demonstrate evidence of the learning outcomes achieved. For example, the Irish Teaching Council requires registration applicants who have received their professional qualification outside of their jurisdiction to showcase appropriate evidence and elements covered in the programme that they have undertaking. The Teaching Council then identifies where there are areas of deficit and learners then apply as modular students to address the areas of deficit identified by the Teaching Council.

## **DISINTEGRATING COMPETENCE**

*Do you agree that it is not sufficient only to assess discrete skills (i.e. follow an atomistic approach) when evaluating competence for occupational practice? Do you agree that generic skills cannot effectively be taught and assessed out of context in vocational programmes? What are the implications? (section 7.10)*

Ultimately an atomistic approach is not enough, though competency-based model confers with the professional requirements of many occupational practices; caution, however, is advised lest defined competencies become over-atomised. In order to enhance learning, the use of holistic competencies within a developmental continuum is recommended. Such a continuum has the advantage of illustrating explicitly the direction of learners rather than merely pointing out the level below which they should not fall. Context is meaningful in both the development and expression of competence and, as such, has an important part to play in both learning and assessment.

Industry professionals should be involved in developing generic skills in higher education programmes, for work placement and employment. Generic skills can be taught and assessed, both in and out of context, in vocational programmes. However, the implications of consistency, standards (NFQ levels), authenticity and reliability cannot be underestimated. Work-based assessors will require education and training to understand and apply this criterion. This also applies to academic tutors who assess learners in the workplace; they need to be educated in assessing generic skills in the context of the work placement. Clearly, there is much to be done in the development of workplace generic assessments which are robust, fair, comparable and consistent. It is essential that early involvement of all stakeholders is advocated to create a synergy between all their associated requirements (both competency and generic assessments) through an overall holistic approach (though at times, an atomistic approach is warranted). Importantly, we need to be confident in our definitions of terms and language so that we can translate it effectively and make sure everyone has a shared understanding.

## **ASSESSMENT HINDERING LEARNING**

*Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (section 7.11)*

Yes, it's important to mitigate against such outcomes and ensure that all higher education teachers have training for appropriate MIPLO and MIPLO framing of assessments while still enabling creativity and innovation.

## **KNOWLEDGE, SKILL AND COMPETENCE**

*Do you agree that teachers and programme designers can sometimes struggle to address all the dimensions of the NFQ (knowledge, skill and competence) adequately in teaching and particularly assessment? What are the implications? (section 7.12)*

Yes. Programmes are not perfect, and the application can have unintended outcomes resulting in positive or negative implications for teaching and assessments. In fact, it may not necessarily be negative, as active reflective practice can identify and bring forward new ways of addressing the dimensions.

### **NORM REFERENCING**

The common use of norm referencing is not up to the task of representing achievement in anything like an absolute sense. Norm referencing such as the Bell Curve Model/Grading by Proportion Model typically employ grade distributions that correlate with the specified proportions, and the learner's relative achievement standing within the cohort. The rationale behind norm referencing or the use of the bell curve/grading by proportion model has its roots in the classic market approach to regulating normal market value when there are no stable independent reference points. In higher education assessments, signifying merit is inherently different from market value, and it is merit, not scarcity, which is the key to grade integrity. By allocating grades through a proportional model, each grade goes to represent a relative position in the cohort, not necessarily the actual level of achievement reached.

Additionally, grade integrity is challenged further by having norm referencing whereby it can make the award of grades structurally blind to a variety of factors and contexts that affect achievement and its assessment. The context of the learner cohort is very relevant, factors such as; learner–lecturer ratios; quality of teaching and academics' qualifications; admission policies and learner entry levels which influence the academic abilities of cohorts; the demographic profiles of cohorts; teaching resources and the availability and type of support services; the quality of teaching; and the quality of assessment programme/strategies are all factors that affect assessment grade integrity.

The use of norm referencing seems to contradict the principles of meeting minimum programme learning outcomes (MPLO). For grades to be true representations of academic achievement, the singular consideration should be how the level of achievement inferred from evidence compares with the minimum levels required for the different grades.

HECA recognises that the Bell Curve Model has the advantage of expressing different scales onto a common scale which will have currency across institutional and national boundaries.

### **WHETHER TO GRADE**

*What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14)*

Generally, it is accepted that grades satisfy and motivate the learner, especially, the competitive or high achiever learner. Additionally it gives all learners an insight into the level of their learning and learning outcome achievements.

Removing grade/award classifications to only adopting a binary pass/fail is not recommended. If learners believe that their final award classification or subject grades are

limited to pass or fail it removes some of the need for feedback, can stifle continuous improvement and creativity/innovation (in both assessment and student aptitude). There could possibly be some further exploration of the different bands, maybe at five-point intervals

## RELIABILITY OF GRADING

*Do you think award classifications practices are consistent? Do you think, when considered at the national level, they are fair to all concerned? What are the implications? (section 7.15)*

There is a consistency within institutions and the QQI sector in general. However, consistency is not as evident across the higher education sector. This lack of consistency implies an unfairness in award classifications nationally especially when one acknowledges that learners may be endeavouring to compete for employment in the same sector. A national classification scheme would support consistency and potentially transparency.

Generally, it is acknowledged that there is a disparity between grading/classifications of awards from one institution to another. This is natural due to differences in MIPL0's/MIMLO's, assessment strategies etc of each provider's programme. While QQI sets the award standards, each provider is free to interpret those and develop their own MIPL0's and subsequent MIMLO's for their respective programme. This programme, while within the same award discipline could/would have different programme objectives than a similar programme from another provider.

There may also be implications within an institution and further focus should be on the pattern of gradings/classifications within an institution. It shouldn't be 'one shoe fits all'.

*Is award classification worth the trouble? What should an award classification signify? Is consistent classification practical? Is it desirable? How might it be possible to get a shared understanding of classifications?*

Award classifications are worthwhile and should be maintained. In relation to consistent classification, it depends on all sorts of variables. There is room for consistent transparency of awards.

There is some disparity in the spread of grades that influence award classification which may contribute to the perception of a lack of fairness in the classifications, e.g. from pass to the threshold of 1<sup>st</sup>/Distinction all have a 10% spread while the 1<sup>st</sup>/Distinction has a 30% spread. There may be merit in creating a 'higher pass' or a 'lower pass' grade.

We should consider developing an explicit set of assessment principles that underpin our approach to practice and improve the transparency and consistency of the grading of award classifications across the higher education sector.

## **GRADING WORK-BASED LEARNING**

*This goes back to If assessments work-based learning should contribute to the final award classification or grade and, if so, how to ensure consistency.*

Yes, they should. As stated in the Green Paper, it is important that the work-based assessment is aligned to the MIPLOs (minimum intended programme learning outcomes) and effective monitoring (supervision) and training of work-based assessor should support consistency.

## **CAPACITY AND COMPETENCE TO ASSESS**

*How do institutions manage competing interests to ensure that they retain a balance of competences (in assessment in particular) suited to the needs of their enrolled learners? (section 7.17)*

With this question, we want to focus on the unfairness experienced by HECA providers in relation to competitors outside HECA. QQI consider the assessment outcome grade of 40-59% as within a PASS bracket (PME Programme) which is validated by Teaching Council. However, awards to students completing PME Programmes in other institutions not under QQI but also validated by the Teaching Council, permit an honours award for learners achieving an assessment grade of 50-59%. Learners from QQI validated PME who achieve between 50-59% have a balance of competences with learners from the other institutions but a disadvantage in the competing stage of employment. In fact, this has a negative impact on graduates from HECA provider, Hibernia College, who achieve between 50-59% as their award is seen by prospective employers as being a PASS as opposed to it being identified as an honours classification from their peers qualifying elsewhere.

## **ONLINE OR REMOTE ASSESSMENT**

*What do you think are the main challenges involved in remote assessment? (section 7.18)*

Replicating the academic integrity of a classroom is one of the main challenges involved in remote assessment. The assessor needs to ensure validity and authenticity of the classroom while considering that requiring online students to travel to a physical testing facility presents significant challenges and defeats the purpose of an online education. The use of webcams and screen-sharing technology ensures the academic integrity of distance online assessments.

## **CONTRIBUTION OF PROFESSIONAL BODIES AND PROFESSIONAL REGULATORS**

*Do you think there is a significant risk of some professional bodies or professional regulators imposing requirements on programmes of education and training that conflict with effective assessment practice? (section 7.19)*

It presents more as an opportunity than a risk to enable professional bodies the opportunity to contribute expertise and practical knowledge to shape assessment practices suited to the

discipline and endorse by the professional themselves. However, it needs to be acknowledged that the priority of the professional body or regulatory body may not be the same as the educator and this can have an adverse effect on effective assessment strategy. Overall, we agree that they can assist with effective assessment practice but should not be the decision maker on assessment strategy.

*How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes?*

An effective method would be engagement with early stage graduates (first year of work) to evaluate how assessments have prepared them for their profession.

### **CONNECTION WITH COMMUNITIES OF PRACTICE**

*Do you agree that persons responsible for assessment need to maintain regular contact with the relevant communities of practice (e.g. scientific communities)? (section 7.20)*

Yes, it would be a positive decision to enable academic assessors to collaborate with relevant communities of practice to ensure that assessments are fit-for-purpose and based on current, valid skills, abilities, knowledge or overall competencies for the profession.

Keeping in touch with communities of practice informs a more practical and cohesive understanding of the shared competencies, tacit and explicit knowledge, and expertise required to support the goals and design of unique, innovative, effective and efficient assessments in the relevant disciplines. Communication with professional bodies will assist the academic in developing a more holistic assessment approach to competencies and education, thereby creating a more rounded learner with discrete skills, knowledge and competencies at module and programme level.

### **ENGAGING LEARNERS AS PARTNERS IN ASSESSMENT**

*What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21)*

Traditionally, learners have been excluded from assessment design, however, engaging and developing learners as partners in assessment enables them to be active participants in their own learning and is part of the recognition of the importance of 'assessment for learning'.

Engaging learners as assessors, such as peer and self-assessment, is a particularly effective form of learning. In such peer-learning situations, learners may have scope for negotiating the content and nature of the learning activity as well as enabling the learners to interpret the rudiments of the role of teachers or assessors of learning. Learners who can negotiate their choice of assessments have an increased engagement in their learning. There are

implications though, especially when all learning outcomes are aligned to summative assessments.

Another key way is engaging the learner in the assessment process; enabling learner involvement in the design, delivery and assessment of their learning which brings about a meaningful learning partnership. The authority relationship in assessment partnerships is usually pointedly different than those in peer-learning partnerships.

It's important to not only engage with learners on assessment strategy but also to educate the learner in how to prepare for the roles they may play in such partnership. The Green Paper is opening the discussion on learners as part of the communities of practice to support learning which is creative and exciting. However, learner engagement must be in a meaningful and not tokenistic way. It's important that the learner is at the centre and empowered to understand pedagogical expertise on assessment strategy and practices *of, for* and *as* learning.

Engaging with learners on assessment strategy at the beginning (or at review stage) of programme development can inform learning outcomes and assessment practices. Engagement can be with existing learners on the programme, or learners at the end of the programme who are about to enter a particular discipline or first year graduates in an active professional environment. Learners at the end of their programme or first year graduates are in an effective position to give feedback on the learning from programme assessments which would allow feed into potential assessment modification.

## **QUALITY ASSURING ASSESSMENT IN THE WORKPLACE**

*What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22)*

Building on the QQI's (2013) quality assurance principles for assessment, validity, reliability, fairness, quality, transparency and complementarity, HECA believes confidentiality should also underpin the QA of the workplace assessments. Constraints of confidentiality and highly regulated environments can impact upon assessment in the work-place and access for assessors. Non-disclosures may be required for access of anyone involved in assessment at any stage including first, second and external markers. Regulatory issues could be considered as part of the learning contract so that terms are negotiated in advance.

Additionally, there needs to be a clear delineation of roles and expectations of stakeholders (including students, supervisors, assessors) involved in work-place learning specifically to prevent learners having inconsistent learning opportunities and experiences. Mutual understanding can be supported by learning contracts which clarify expectations. These can be structured around MIPLOs and MIMLOs which have been coherently linked to occupational needs. Guidelines and principles to support this process could be beneficial to create sectoral consistency without relying on prescriptive



requirements which could constrain autonomy to create and structure work-place learning opportunities.

## Higher Education and Training Issues

### AWARDS STANDARDS, ACTUAL LEARNING OUTCOMES (ALOS) AND CLASSIFICATIONS

*We suspect that the way higher education students are assessed allows for a spectrum of standards to be maintained for major awards. A move to a system where assessment is absolutely valid and reliable for the purpose of maintaining nationally agreed threshold standards might have consequences that would be uncomfortable for society if it demonstrated a wide spread around mean standards and identified those programmes where the standards were below the mean (i.e. half of all programmes should the distribution be symmetrical).*

It is very difficult to have absolute validity.

*If we pick two first class honours bachelor degree qualifications from different institutions but in the same subject should we expect them to be equivalent? If so, what do we mean by equivalent?*

Yes and No.

Yes, the same standard should be equivalent within bands.

No, as it depends on what is meant by equivalent. For example, both programmes may have different PLO's, MLO's, assessment strategies which will impact on the knowledge, skills and competence. The only equivalent thing between them would be the title of the final award and some subject headings.

The answer from the market is also no, most notable in relation to higher education ranking and reputation. However, in a practical sense, this does not necessarily mean that all programmes from a higher education provider in a top ranking is better than a programme from a provider in a lower ranking. Positive promotion of a programme can also be a factor in the public's perception of the standard of an award. A recommendation for QQI is not to impose standards on assessment but to go public about how learning is assessed.

In addition, we accept that learners and other stakeholders should reasonably expect institutions to maintain their own academic output standards. However, we do not accept that learners and other stakeholders can or do expect 'reasonable comparability' in academic output standards across the Irish higher education system.

To be truly "equivalent" would require a uniformity in curriculum, assessment criteria and classification standard that would undermine institutional diversity of provision.

*Is there an 'A list' group of providers whose qualifications are significantly more valuable in some sense? Would we, as a society, be happy to have a tiered system where qualifications from 'A list' providers are much harder to get than those from 'B list' providers (recognising that that might be due partly to selective enrolment)? Are we already in that state?*

There is a perception that qualifications from certain providers are more valuable than others. However, this does not necessarily mean that the qualifications from the 'A' list providers of the same standard or title are '*much harder*' to get than those from the 'B' list and society should and would expect the standard and level of work for a similar award to be equivalent. Having said that, entry standards are a factor in gaining entry, as are equity of access and student pathways. There is, however, a perception in society that we are already in a two-tier higher education system where one sector's qualifications and assessments are perceived as higher and "*harder*" contrary to awards alignment to the NFQ.

In relation to question, we are probably already in that state, if the measure is the perception of the consumer. It is not possible for QQI, or others, to impose a tiered/group system that would be acceptable to all providers. The market will do this anyway.

*Is the restriction on repeat for honours still warranted? If not, should learners be allowed to keep repeating examinations until they achieve their desired result? Are examinations designed for first-attempters valid and reliable for repeating students? If there is to be a penalty for those who must repeat, what should it be?*

No, the repeat for honours restriction is in principle intrinsically unfair. Frequently you have learners who perform excellently throughout a three-or four-year programme only to experience a "bad day" and have their final award capped. This concept is grossly unfair and creates a prejudicial award classification where providers obtaining their higher education validations from QQI are capped with no repeat for honours while other higher education sectors are not capped.

HECA has considerable resistance to the current policy on 'no-repeat' for honours. A system whereby the module was capped rather than the award would be better. Under these circumstances, QQI's policy on fairness and not disadvantaging a student is challenged by this process.

Moreover, to compound the unfairness, we understand that different practices are employed across the IoT sector in relation to this issue. Therefore, learners are treated inconsistently. The conventions were established to avoid inconsistencies.

There should be a limit on how many times a learner can repeat an assessment and a capping penalty at a modular level. For consistency and fairness, the examination designed for first-attempters should remain for repeaters, unless, the assessment strategy allows for different assessment practices to achieve specific learning outcomes.

## 2009 Sectoral Conventions for Assessment

*What has been the experience of operating with these conventions for nearly a decade?*

It has enabled providers speak the same language. However, is it now timely to revisit or review NFQ?

See points above regarding repeat for honours and the conventions.

## INTEGRATED ASSESSMENT

*Modularisation when taken to extremes can be problematic (section 7.5). But there is also a risk with any modular programme that the overarching intended programme learning outcomes are not given due prominence in teaching, learning or assessment.*

*What can be done to help ensure that the overarching intended programme learning outcomes are given due prominence in teaching, learning and assessment?*

- Programme handbook-module descriptor
- MIMLO and MIPLO - perhaps with a focus on the mapping communication of MIMLO and MIPLOs.
- Module descriptors to refer to MIMLOs and MIPLOs
- Assignment to link with module aims and PLO.
- Mentorship/training for programme teams in curriculum development (to have the bigger picture of the whole programme, especially looking at how each module fits into the whole programme and how the whole programme hangs together).
- Cap on module is fairer than a cap on award.
- Cross compensation guidelines needed.

*How can programme designers approach the optimisation of the modularisation of programmes to ensure that an appropriate balance is struck between optimising opportunities for effective learning and optimising the use of the provider's resources, recognising that there are trade-offs involved?*

- It's essential that the module meets all the LO, this is the minimum standard.
- Robust assessment strategy.
- Cross module assessments, grading system and MIMLOs are being examined.
- Its important to avoid duplicity and over burdening the provider (and learner) with too many assessments.

## ASSESSMENT LITERACY

*What supports need to be put in place to assist learners make the transition and, particularly to help them to engage with the modes of assessment of learning employed in HE and to avoid hazards associated with these?*

- Early learner education and training on assessment strategies and practices of higher education and training.
- Formative assessments with focused feedback. Early intervention and support of “at risk” learners.
- Educator training in the pathways to HE e.g. a broad understanding of Post primary assessment strategies and learning outcomes.

## ACADEMIC INTEGRITY IN THE CONTEXT OF ASSESSMENT

As stated in the Green Paper, there is significant literature and policies on academic integrity. In general, it’s essential to have policies and procedures as well as providing learners and teachers/assessors with guidance and training on what signifies academic or research misconduct and the development of good practices in maintaining academic and research integrity.

In the context of assessments; resources can influence academic integrity with some demanding assessments considerably reducing the risk of compromised academic integrity such as viva voce. Academic integrity on the teacher’s part needs also to be highlighted e.g. when the teacher has set knowledge of the test, it can lead to a distortion in results. On an institutional level, publication of award classification and grades can challenge ethics. On this theme, QQI refers to academic integrity in relation to institutions awarding “*unduly high grades relative to the norm*” thereby giving its learners an “*unfair advantage and undermining trust in qualifications generally*”. It must be noted that unwarranted grade inflation and deflation to adhere to a bell curve must also be considered as a breach of academic integrity.

Notably if a higher education provider loses its reputation for academic integrity, the implications for its continued existence are endangered. Reputational damage to one provider may also lead to damage to the wider Irish higher education sector. Providers need to monitor the effectiveness of practices and systems, including partners in work-based learning, to ensure that they are congruent, compatible and equally robust. The details in this regard must be thoroughly worked through before agreements are entered into. Providers need to be proactive by minimising opportunities to engage in academic dishonesty as well as being alert to new forms of academic misconduct. The ever-increasing availability of internet and digital technologies (including smartphones), and of electronic academic content, increases the potential for new forms of academic misconduct. Providers need to be aware of the capabilities and potential of emerging technologies, and of the issues these may cause for the protection of academic integrity.

## Towards General Principles and Guidelines for Assessment of Learning

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

Yes

*What should the principles and guidelines address?*

See section WORKING WITH INTENDED LEARNING OUTCOMES AND HOLISTIC ASSESSMENT

*To whom should the general guidelines apply (should they extend, for example, to all providers and awarding bodies quality assured by QQI or only to providers with DA or QQI validated programmes)?*

All

### EXTERNAL EXAMINING AND AUTHENTICATION

*Do you think that external examining and authentication reliably ensure that NFQ awards of the same type awarded to learners in the same discipline in different institutions are of a similar standard to one another?*

This is generally true. However, external examiners tend to work with only one institution at a time which may not lead to useful comparisons across the institutions.

Interaction between public/private/independent/IoTs and Universities helps to ensure reliability but cannot fully do so. Without external examining, there could be lower standards. Overall more standardisation, training and time (the cycle could be extended to four years) is required. Former FE practices could also provide a model for HE.

*Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?*

Yes. This would be beneficial to some providers combing HET/FET QA for Re-engagement (re IV/Exam Board/Approved List).

*Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.*

- Academic Council has QQI Monitoring
- Provide an extra line of moderation
- Peer review?
- Randomised?

Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)? To whom should the general guidelines apply?

Yes, specific guidelines for providers that span both FE and HE, public and private providers would be useful.

*What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?*

When considering meaningful external scrutiny, a view should be taken of the current external examining system. The performance of external examiners is seen as varied and a potential improvement to the Guidelines could consider the development of a body of credible, trained external examiners that could enhance quality and direct/enable a more holistic learner experience and assessment.

It is still unclear how an enhanced external examiner system would work in practice under the improved guidelines. There should be minimum requirements that the external examiner assures are followed at a programme level and some consideration could be given to a subject specialist approach for external examiners. Theoretically, these guidelines could be generalised to cover all kinds of external moderation in all educational sectors but there is a dependence on the rigour of the external examiner and as has already said, there is variation between external examiners.

Another concern is related to an external examining system that would require participants to undertake more demanding training. Is this appropriate only to those early career academics who may not feel that they have enough experience to put themselves forward? Undeniably, a reluctance to engage could also be true of those more experienced academics who may feel that it is unnecessary to engage with a training process for something that they may have been involved in for numerous years.

## **DIGITAL ASSESSMENT**

*What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?*

Applications of technology to assessment and feedback are becoming more embedded in the institutional vision for high-quality assessment, teaching and learning. These changes

drive assessment enhancement when implemented with associated pedagogic principles and academic technology training.

Already, information and communications technology are commonly used for accessing information and to produce assessments in a digital format. Conversely, the ability to use personal technologies in assessment; greater opportunities to use creative media in assignments; engage in online discussions and collaborative authoring; technology-enabled peer and self-assessment are beginning to gain more credibility in higher education assessments. Technology has already established significant supports for grading, plagiarism detection and provision of feedback.

While the incorporation of technology into higher education assessments is presently growing at a steady pace, technology itself is evolving even more rapidly. We increasingly expect higher education providers to employ a variety of technology-based tools in future assessments. The future focus of digital assessments aligned to the most appropriate assessment strategies will be driven from the grassroots level; the effective innovative, early-implementer in the academic workforce who have engaged with technologies in designing assessment *of, for* and *as* learning.

Assessments will become ever more varied with authentic ways of assessing learning via e-enabled assessment management and administration systems to monitor learners' progress and improve teaching and learning i.e. e-portfolios, blockchain portfolios, digital peer to peer, collaborative writing, social media based, simulations and online scenarios, personal feedback by video, audio and digital ink annotation and large-screen handheld devices used for fast on-location assessment, marking and feedback. While many of these are already being utilised by higher education providers, it is anticipated that technology will in the future facilitate assessment enhancement previously difficult to achieve at scale. Automated assessment/intelligent tutorial systems are also showing potential in terms of reduced workload around assessment, especially so if the systems provided automated feedback.

Building on our adaptability points discussed earlier in this response, it is recommended that future focus on next generation learning management across the higher education sector would help educators keep pace with the needs of 21st century learners, especially in the context of promoting digital assessment that drives development in this area rather than technology developers who may not have significant regard for pedagogy.

## Apprenticeship Issues

In relation to apprenticeship learning, there is an intersection between apprenticeship learning and traditional work-based learning where both are forms of employer-led learning. This suggests that all work-based learning can sit in one over-arching framework rather than creating individual frameworks for each. Although employer consultation has always been important, the apprenticeship has created a new emphasis which purposefully puts the employer at the forefront of development.

For the majority, every programme is intending to produce workplace-ready graduates and multiple stakeholders (students, employers, academics, professional bodies and standards, regulatory bodies) need to be actively involved in the programme development to enable that outcome.

*What can be done to help increase the reliability and validity of competence assessment in the workplace?*

Traditional modes of assessment which are thought of as reliable should be used with caution in the workplace. An emphasis on academic assessments and outcomes should not be conflated with actual work-place performance. The practicalities of scaling up assessments that require multiple layers of moderation for reliability purposes needs to be considered.

All skills should be learned in context so that learning can be transformational and valid rather than task-based. Key occupational tasks can be identified through an occupational profile modelled on the apprenticeship requirements, which can be used to scaffold development MIPLOs and MIMLOs with work-place requirements at the forefront of development.

Intuitively speaking, work-place supervisors who are witnessing learners in action are best placed to determine if they are achieving their intended goals. In practice there can be a disconnect where work-place supervisors don't view themselves as 'assessors'. Training is required for work-place supervisors to clearly outline expectations and requirements. Standards for non-academic work-place assessors could help inform training and resolve this disconnect.

Scheduling is another consideration. Traditional block-release modes of learning can cause siloed learning where students are reacclimatising to a specific mode of learning at each block rather than integrating theory with practice. Sequential structures that allow theory to be taught in tandem to work-based learning (time split between traditional learning and work-based learning on an ongoing basis) can allow students to consistently apply and develop their understanding of theory as it becomes contextualised in the work-place.

This goes back to the culture of trust that is promoted in the green paper. What QQI may consider for future guidelines is more practical guidance on how a culture of trust can be instilled given that we are coming from such a low-level starting point.

See also section on DISINTEGRATING COMPETENCE

*What can be done to encourage industry to become more involved in discussions about approaches to assessment?*

Bring industry in as early as possible in the development of programmes, the validation of programmes and the re-validation of programmes. QQI can stipulate the need for industry engagement.



- Encouraging industry to be involved from the beginning where they can inform assessments rather than at the end of the programme.
- Highlight the key set of skills to hit the ground running as a graduate in the industry. Work with the industry to identify what a graduate should be capable of in the sector.
- Have the industry represented on validation panels.
- Identify effective assessments that are of benefit to the learner, the higher education provider and the industry.
- Integrate industry focused learning contracts and incorporate industry needs and competencies into learner's portfolio.

*What can be done (and by whom) to help support professionals in industry who are responsible for mentoring and assessing apprentices? What can be done to ensure that assessment is suitably consistent while allowing for necessary workplace diversity?*

As mentors already have a job, integrating supports that do not considerably add to their time pressure is beneficial i.e. design user friendly documents/operational checklists etc to support assessment; alignment of assessment aims to the professional bodies and standards; create a code of conduct template for employers/mentors; standardised assessment template. This may work easier in some industries more than others.

Supervision of mentors and/or more than one person grading the outcome may also support consistency.

Fundamentally, it's important that employers work with the educators to identify the key learning outcomes of skills required during each stage of work placement. This needs to be transferable to the mentor clearly and concisely in a methodology that is still flexible enough to consider the diversity of the workplace setting and learner.

*Should workplace assessment results be graded as distinct from being reported as successful/ unsuccessful without gradation? Why/why not?*

It is easier for the employer to have a pass/fail marking. However, it may be a disincentive for some learners unless they see potential future employment from the work placement. There may also be a reluctance from the assessor in workplace assessments to be the ultimate grader even though they are often best placed to judge set competencies.

On the other hand, the relevance of assessment may benefit from a weighted grading; again, this varies depending on certain circumstances, clear descriptors, objective national or industry standards and types of industry.

*Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?*

Yes, probably, depending on the industry sector and would be beneficial and certainly easier if the standard or generic grid was set by industry regulators or professional bodies (if there

is a professional body, if not, it may be more difficult). There could be an overarching framework.

## Bibliography

QQI (2013) Quality Assuring Assessment: Guidelines for Providers. Revised 2013. [Internet]. Available from:

<https://www.qqi.ie/Downloads/Quality%20Assuring%20Assessment%20-%20Guidelines%20for%20Providers%2C%20Revised%202013.pdf>

National Forum for the Enhancement of Teaching and Learning in Higher Education (2017) Work-Based Assessment OF/FOR/AS Learning: Context, Purposes and Method. [Internet]. Available from:

<https://www.teachingandlearning.ie/publication/work-based-assessment-of-for-as-learning-context-purposes-and-methods/>

National Forum for the Enhancement of Teaching and Learning in Higher Education (2018). Staff Use of Technology-Enhanced Assessment in Higher Education: A Systematic Review. [Internet]. Available from:

<https://www.teachingandlearning.ie/publication/staff-use-of-technology-enhanced-assessment-in-higher-education-a-systematic-review/>

National Forum for the Enhancement of Teaching and Learning in Higher Education (2017) Profile of Assessment Practices in Irish Higher Education. [Internet]. Available from

<https://www.teachingandlearning.ie/publication/profile-of-assessment-practices-in-irish-higher-education/>

Standards and Guidelines for Quality Assurance in the European Higher Education Area (2005). The European Association for Quality Assurance in Higher Education. [Internet]. Available from: [http://www.bologna-bergen2005.no/Docs/00-Main\\_doc/050221\\_ENQA\\_report.pdf](http://www.bologna-bergen2005.no/Docs/00-Main_doc/050221_ENQA_report.pdf).

Name: Patricia O Sullivan

Address: HECA, Higher Education Colleges Association, Griffith College, South Circular Road,  
Dublin 8, Ireland.

Email Address: [patriciasullivan@heca.ie](mailto:patriciasullivan@heca.ie)